

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

| | | |
|---|---|-------------------------------|
| AMERICAN COPPER & BRASS, INC., |) | |
| a Michigan corporation, individually |) | |
| and as the representative of a class of |) | Civil Action No. 1:09-cv-1162 |
| similarly situated persons, |) | |
| |) | |
| Plaintiff, |) | Hon. Gordon J. Quist |
| |) | |
| v. |) | |
| |) | |
| LAKE CITY INDUSTRIAL PRODUCTS, |) | |
| INC. and JEFFREY MEEDER |) | |
| |) | |
| Defendants. |) | |

**PLAINTIFF'S UNOPPOSED MOTION REQUESTING PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT AND AUTHORIZATION
TO SEND NOTICE TO THE SETTLEMENT CLASS BY FAX AND MAIL**

Plaintiff, American Copper & Brass, Inc. ("Plaintiff"), on behalf of itself and a proposed settlement class of similarly-situated persons (identified herein as the "Settlement Class"), respectfully requests, pursuant to Fed. R. Civ. P. 23 (e), that the Court enter an order (1) preliminarily approving the parties' proposed class action Settlement Agreement (the "Agreement") attached to Plaintiff's supporting brief as Exhibit A, (2) approving the form of Class Notice attached as Exhibit 2 to the Agreement and its dissemination to the Settlement Class by both fax and mail, and (3) setting dates for opt-outs, objections, and a fairness hearing to take place no sooner than 120 days after the entry of preliminary approval, in order to allow time for the government officials to receive the notice required by CAFA to respond, if they so desire, and to give the Parties time to reply. Plaintiff suggests that the Court select a date during the weeks of February 15, 2016 or February 22, 2016.

This motion is unopposed.

A proposed Preliminary Approval Order is attached as Exhibit 1 to the Agreement and as Exhibit B to the Brief and will be submitted to the Court electronically.

Plaintiff has filed a brief in support of this motion. At the end of the brief, Plaintiff proposes suggested dates for entry in the Preliminary Approval Order.

Respectfully submitted,

s/David M. Oppenheim
One of Plaintiff's attorneys

Jason J. Thompson
SOMMERS SCHWARTZ
2000 Town Center, Suite 900
Southfield, MI 48075
Telephone: 800/783-0989
Email: jthompson@sommerspc.com

Phillip A. Bock
Tod A. Lewis
James M. Smith
BOCK & HATCH, LLC
134 N. La Salle Street, Suite 1000
Chicago, IL 60602
Telephone: 312/658-5500

Brian J. Wanca
Ryan M. Kelly
David M. Oppenheim
ANDERSON + WANCA
3701 Algonquin Road, Suite 500
Rolling Meadows, IL 60008
Telephone: 847/368-1500

CERTIFICATE OF E-FILING AND SERVICE

I hereby certify that on October 14, 2015, I electronically filed the foregoing *Plaintiff's Unopposed Motion Requesting Preliminary Approval* using the ECF System, which will send notification of such filing to all counsel of record.

s/David M. Oppenheim